



## National Highways Planning Response (NHPR 21-09) Formal Recommendation to an Application for Planning Permission

From: Simon Boyle (Regional Director)  
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To: Kirklees Council FAO Richard A Gilbert

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**Council's Reference:** 2022/91477

**Location:** Land off Lindley Moor Road, Lindley, Huddersfield, HD3 3SX

**Proposal:** Hybrid Planning Application for the erection of an industrial unit for E(g)/B2 /B8 use with associated access, parking, groundworks, and landscaping in conjunction with an outline application for mixed use development use class E(a), E(b), E(g), B2 and B8

**National Highways Ref:** 95504

Referring to the consultation on a planning application dated 11 July 2022 referenced above, in the vicinity of the M62 that forms part of the Strategic Road Network, notice is hereby given that National Highways' formal recommendation is that we:

- ~~a) offer no objection (see reasons at Annex A).~~
- ~~b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A National Highways recommended Planning Conditions & reasons).~~
- c) recommend that planning permission not be granted for a specified period (see reasons at Annex A).
- ~~d) recommend that the application be refused (see reasons at Annex A)~~

Highways Act 1980 Section 175B is not relevant to this application.<sup>1</sup>

This represents National Highways' formal recommendation and is copied to the Department for Transport as per the terms of our Licence.

Should the Local Planning Authority not propose to determine the application in accordance with this recommendation they are required to consult the Secretary of State for Transport, as set out in the [Town and Country Planning \(Development Affecting Trunk Roads\) Direction 2018](#), via [transportplanning@dft.gov.uk](mailto:transportplanning@dft.gov.uk) and may not determine the application until the consultation process is complete.

<b>Signature:</b>	<b>Date: 28 July 2022</b>
<b>Name: Paula Bedford</b> <b>National Highways</b> <b>Calder Park House, Calder View,</b> <b>Calder Business Park,</b> <b>Wakefield,</b> <b>West Yorkshire</b> <b>WF2 7UA</b>	<b>Position: Assistant Planning</b> <b>Manager</b>

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<sup>1</sup> Where relevant, further information will be provided within Annex A.

## **Annex A National Highway's assessment of the proposed development**

National Highways has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

### **Recommend a Temporary Period of Non-Determination:**

Our review has highlighted the need for further information as follows:

- 1) No study area has been established within the TA and given the proximity of the development proposals to the SRN, it is considered that the study area – and associated traffic survey data – is insufficient in terms of its scope.
- 2) As with the comments relating to the study area, the PIA information does not take into account the SRN. Furthermore, the PIA data covers time periods when COVID-19 restrictions were in place, therefore not reflecting five years of 'normal' conditions with regards to flows on the network. As such, this should be revisited by Paragon, with the SRN taken into account (should it be considered to be part of the study area).
- 3) Given that an end user is stated as being identified, it is not considered appropriate to use outputs from the TRICs database when considering Unit P, when a 'first-principles' approach should be utilised for both the trip generation and trip distribution.
- 4) It is considered by JSJV that issues pertaining to parking provision and parking standards are primarily a matter for the Council to address. However, it is considered by JSJV that parking restraint can drive modal shift to reduce the reliance on single-occupancy private vehicle trips to and from the site. Furthermore, given the end user of Unit P is already known, it is considered by JSJV that as stated previously, a 'first-principles' approach could also be undertaken when deriving the parking provision, to ensure the most appropriate number of spaces are provided, in line with the Council's requirements.
- 5) DfT Circular 02/2013 has not been included within this section of the TA. Given JSJV's previous comments regarding the lack of reference of the SRN within the TA, this is not considered surprising. However, it is considered by JSJV that the Circular should be included, as well as the TA being compliant with the Circular.
- 6) The trip generation for Unit P is stated as being 20 two-way trips in the Morning Peak and 14 two-way trips in the Evening Peak. However, as stated previously, as the end user is known, a 'first principles' approach should be taken to trip generation. This would allow JSJV to ascertain the impact of the development proposals at the SRN.

- 7) The trip rates presented in Table 6 are accepted by JSJV, based on the TRICs outputs presented in Appendix F. However, as with Unit P, if the end users are known in advance of the planning submission for Units A and H – N, then a 'first principles' approach should be utilised with regards to trip generation.
- 8) With regards to the warehousing units – Units F and G – considered in Tables 8 and 9, given that it is stated that the development mix is to potentially change, it is considered that it would be more robust to assess these sites as Parcel Distribution Centres, which could also be delivered under a 'B8' planning consent, and would reflect the trip-generating potential of these units. As such, it is considered by Paragon that this element of the trip generation should be altered to robustly capture this.
- 9) From the trip rates presented in Table 10, it is considered by JSJV that the trip rates are an underestimation of the trip generation potential of these units in the Morning Peak, as 'drive-thru' facilities could be delivered at this location, given that the development mix is to potentially change.
- 10) It is considered by JSJV that considering the café / takeaway units as 'drive-thru' facilities is a more robust approach.
- 11) Having reviewed the trip rates and trip generation provided in Tables 14 and 15 with the TA, it is not apparent as to why there is a trip generation in the Morning Peak, as opposed to the two café / takeaway units proposed which do not. As such, clarification is required from Paragon as to the differing approaches.
- 12) Based on JSJV's review of the trip generation figures presented, the numbers presented in Table 16 which details the total trip generation across all units cannot be accepted at this time.
- 13) The traffic growth factors are noted by JSJV, JSJV's previous comments regarding the study area and inclusion of the SRN remain valid and should be addressed.
- 14) Given the various uses proposed at within the development proposals, it is considered more robust to provide distributions for each of the use classes proposed, compared with the homogenous distribution approach undertaken within the TA; and
- 15) The Travel Plan appears to be acceptable, but it is considered a matter for the Council to agree upon.

I will re-visit this recommendation no later than 13<sup>th</sup> January 2023